

EXHIBIT A

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

FILED
CIVIL INTAKE
2019 NOV -8 AM 11:30

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

DONNA DIANNE WATSON

Plaintiff

Case No.

2019 15296

v.

RACHEL INEZ ORONA
8321 Carnegie Drive
Vienna, Virginia 22180

And

THE SALVATION ARMY, an unincorporated association
NATIONAL CAPITAL AND VIRGINIA DIVISION HEADQUARTERS
2626 Pennsylvania Ave NW, Washington, DC 20037
Serve: Secretary of Commonwealth

Defendants

COMPLAINT AND JURY DEMAND

The Plaintiff, Donna Dianne Watson, by counsel, moves for judgment against the Defendants Rachel Inez Orona and The Salvation Army, National Capital and Virginia Division, jointly and severally, in the amount and on the grounds as follows:

1. The Plaintiff Donna Dianne Watson is a resident of Prince William County, Virginia.
2. The Defendant Rachel Inez Orona is a Virginia resident, residing at 8321 Carnegie Drive in Vienna, Virginia, and upon information and belief, at all times relevant hereto was employee and/or agent of The Salvation Army, and acting within the scope of her employment and/or agency.
3. The Defendant The Salvation Army, National Capital and Virginia Division, is an unincorporated association with its principal place of business at 2626 Pennsylvania Avenue, N.W.

Washington, DC 20037, and upon information and belief at all times relevant hereto was the employer of the driver Rachel Inez Orona, and is therefore responsible for the actions of its agent and/or employee herein under the doctrine of respondent superior.

4. That on November 30, 2017 at approximately 10:50 AM, the Plaintiff Donna Dianne Watson was operating her Ford Explorer in the eastbound far left lane on Braddock Road at its intersection with Campus Drive in Fairfax County, Virginia and was at a complete stop at the red traffic signal.

5. At the same time and place, the Defendant Rachel Inez Orona was operating a Ford Fusion owned by her employer The Salvation Army, driving in the far left lane approaching directly behind the Plaintiff's vehicle on Braddock Road, and failed to see the Plaintiff's vehicle stopped at the red light, and struck the rear of the Plaintiff's stopped vehicle at a high rate of speed with great force.

6. At the aforementioned time and place, it was the duty of the Defendant Orona to operate her motor vehicle free from negligence and with due regard for the safety of other persons.

7. Notwithstanding said duty, Defendant Orona did then and there recklessly, carelessly and negligently operate her vehicle in that she:

- a. disregarded a red traffic signal;
- b. operated her vehicle at an excessive rate of speed under the circumstances then and there existing;
- c. failed to keep a proper lookout;
- d. failed to give full time and attention to the operation of her motor vehicle;
- e. failed to keep her vehicle under proper control;

f. operated her vehicle in a reckless manner;

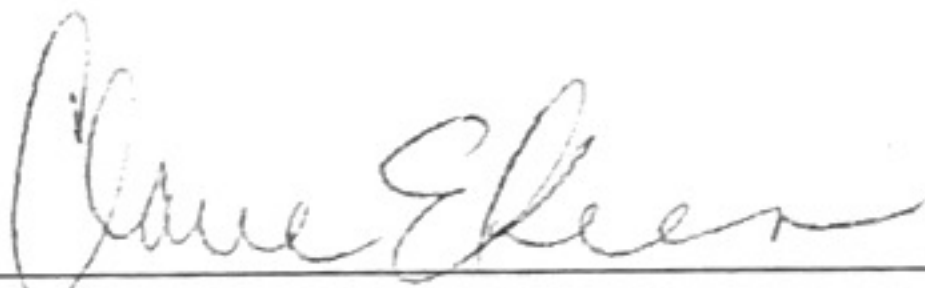
g. acted in such other negligent ways as may be determined in discovery in this matter.

7. As a direct and proximate result of the Defendant Orona's actions as aforesaid, Plaintiff Donna Dianne Watson was caused to sustain serious and permanent injuries, has been prevented from transacting her business; has suffered and will continue to suffer great pain of body and mind; has incurred and will incur in the future, hospital, doctors' and related bills in an effort to be cured of said injuries.

WHEREFORE, the Plaintiff Donna Dianne Watson demands judgment against the Defendants, Rachel Inez Orona and The Salvation Army, National Capital and Virginia Division, jointly and severally, in the amount of seven hundred fifty thousand dollars (\$750,000.00), together with her costs in this action.

DONNA DIANNE WATSON

By Counsel



Claire E. Keena, Esq., VSB 28752
Nichols Zauzig Sandler, PC
12660 Lake Ridge Drive
Woodbridge, VA 22192
(703) 492-4200
ckeena@nzslaw.com
Counsel for Plaintiff